

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:

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Garden Oaks Maintenance Org., Inc. § CASE NO. 18-60018-H2-11

§

DEBTOR

§

EMERGENCY MOTION TO APPROVE SOLICITATION MATERIAL

THIS APPLICATION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE APPLICATION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE APPLICATION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE APPLICATION AT THE HEARING.

EMERGENCY RELIEF HAS BEEN REQUESTED. IF THE COURT CONSIDERS THE MOTION ON AN EMERGENCY BASIS, THEN YOU WILL HAVE LESS THAN 21 DAYS TO ANSWER. IF YOU OBJECT TO THE REQUESTED RELIEF OR IF YOU BELIEVE THAT THE EMERGENCY CONSIDERATION IS NOT WARRANTED, YOU SHOULD FILE AN IMMEDIATE RESPONSE

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

COMES NOW, Garden Oaks Maintenance Organization, Inc., (“Debtor” or “GOMO”) and files its *Emergency Motion To Approve Solicitation Material*, and would respectfully show the Court as follows:

1. In conjunction with the solicitation for approval of the Debtor's Chapter 11 Plan, the Debtor proposes the following procedures, and materials for consideration and approval by the Court:

- a. Exhibit A to be included in all packages for all classes, printed on yellow paper.
- b. Classes 1, 2, 3 and 4
 - i. Summary
 - ii. Ballot
 - iii. Order Setting Deadlines
 - iv. Plan (exhibits on request)
 - v. Disclosure Statement (exhibits on request)
- c. Class 5(a)
 - i. Summary
 - ii. Ballot
 - iii. Order Setting Deadlines
 - iv. Plan (exhibits on request)
 - v. Disclosure Statement (exhibits on request)
 - vi. Redlined and Clean Version of Bylaws
 - vii. Redlined and Clean Version of Section 1 Amended Deed Restrictions
- d. Class 5(b)
 - i. Summary
 - ii. Ballot
 - iii. Order Setting Deadlines
 - iv. Plan (exhibits on request)
 - v. Disclosure Statement (exhibits on request)
 - vi. Redlined and Clean Version of Bylaws
 - vii. Redlined and Clean Version of Section 2 Amended Deed Restrictions
- e. Class 5(c)
 - i. Summary
 - ii. Ballot
 - iii. Order Setting Deadlines
 - iv. Plan (exhibits on request)
 - v. Disclosure Statement (exhibits on request)
 - vi. Redlined and Clean Version of Bylaws

vii. Redlined and Clean Version of Section 3 Amended Deed Restrictions

f. Class 5(d)

- i. Summary
- ii. Ballot
- iii. Order Setting Deadlines
- iv. Plan (exhibits on request)
- v. Disclosure Statement (exhibits on request)
- vi. Redlined and Clean Version of Bylaws
- vii. Redlined and Clean Version of Section 5 Amended Deed Restrictions

WHEREFORE, the Debtor requests the Court to approve the solicitation materials and plan provided, and to grant it such other and further relief, at law or in equity, to which it may be justly entitled.

Dated: January 27, 2019.

Respectfully submitted,

By: /s/ Johnie Patterson

Johnie Patterson

State ID# 15601700

ATTORNEY FOR THE DEBTOR

OF COUNSEL:

WALKER & PATTERSON, P.C.

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CERTIFICATE OF SERVICE

I, Johnie Patterson, hereby certify that a true and correct copy of the foregoing *Motion* has been served upon Mr. Charles Rubio, and upon all other parties receiving notice through CM/ECF, by electronic transmission on January 27, 2019.

/s/ Johnie Patterson

Johnie Patterson